

Honorable Judge Jed S. Rakoff
United States District Court
Southern District of New York

Re: United States of America v. Suresh Munshani, 22cr215
Request to Appoint a Paralegal

Dear Judge Rakoff,

On April 13, 2022, I was appointed to represent Suresh Munshani under the Criminal Justice Act, 18 U.S.C. §3006A (“CJA”). I write to request the appointment of Stacey J. Clarke as a paralegal to assist with Mr. Munshani’s matter. I respectfully suggest that appointment of a paralegal would represent a cost saving measure to the Court and a time saving measure for counsel.

We expect the discovery in Mr. Munshani’s matter to be voluminous including, phone calls and texts, financial records and reports, and surveillance.

Ms. Stacey Clarke has over 7 years’ experience as a bilingual legal assistant. Ms. Clarke has researched and prepared documents for litigation, appeared on behalf of corporations in administrative matters, reviewed, translated, and prepared court documents as well as assisted in the preparation of correspondence between attorneys and the Courts. Ms. Clarke has assisted defense counsel and other attorneys on numerous cases in the past by converting, reviewing, and organizing discovery to prepare for Counsel. Ms. Clarke is fluent in Spanish and has assisted counsel in translating court documents as well as assisting in proffer prep with Spanish speaking clients. Ms. Clarke has also been the liaison between defense counsel and law enforcement agencies, attorneys, and medical providers for the purpose of obtaining case-related information.

In *United States v Darinso Marte Reyes 20-Cr.-022* (PAC), Ms. Clarke organized the discovery essential to Mr. Marte-Reyes, translated documents into Spanish from English, reviewed and translated phone calls from Spanish to English, assisted with translation during in person Jail visits to MCC/MDC and assisted Counsel in reviewing the documents.

In *United States v Darrius Sutton, 1:20-cr-00323* (AMD) Ms. Clarke assisted with reviewing phone calls, YouTube videos, police reports, medical records and surveillance videos as well as scheduling video calls, counsel visits, and preparing both digital and hard copies of discovery for review.

Ms. Clarke has also assisted defense counsel in *United States v. Miguel Gonzalez., 20 Cr. 507* (PAC) where Mr. Gonzalez was wrongfully charged and indicted on charges of conspiracy to distribute a controlled substance, and 2 counts of 924c. Mr. Gonzalez was facing a 15-year mandatory minimum on a case he was insistent he was innocent of. Ms. Clarke assisted defense counsel with reviewing numerous cell phones, videos, and pictures in prep for an innocence proffer that resulted in the US Attorney’s office dismissing all charges against Mr. Gonzalez.



MANAGING PARTNERS
Phillip C. Hamilton, Esq.
Lance A. Clarke, Esq.

A copy of Ms. Clarke's CV is attached to this letter for the Court's consideration. If the Court is inclined to grant this request, I respectfully request that Ms. Clarke be appointed at the paralegal rate of \$85 per hour for up to 100 hours given her ability to assist defense counsel in reviewing and organizing discovery for review with Mr. Munshani at an economical rate.

Lastly, the defense requests that this letter be filed under seal as there are strategic aspects of trial preparation which the government should not be privy to at this time.

Thank you for your consideration to this matter

May 9, 2022

Respectfully,

Lance A. Clarke

Lance A. Clarke

Stacey J. ClarkeTel: (347) 339-9053 – Email: SC@HamiltonClarkeLLP.com**PROFESSIONAL EXPERIENCE:****Hamilton Clarke, LLP**

New York, NY

04/20-Present

Paralegal/ Translator

- Trial Prep; review, translate and organize discovery
- Assist in the preparation of various court documents.
- Attend meetings and assist attorney with preparation of clients for meetings with the government and law enforcement

Richman Property Services

New York, NY

09/18-4/20

Assistant property Manager/Legal Assistant

- Prepare documents in preparation of litigation
- Ensuring compliance with Housing regulations
- Ensuring building is up to code, and repairs are swiftly and properly accomplished.
- Review and assess documentation necessary for compliance with HDC.
- Schedule the showing of vacant units.

Bernstein Clarke & Moskovitz, PLLC

New York, NY

9/16-4/20

Contract Paralegal

- Review, translate and prioritize discovery for lead attorney
- Assist in the preparation of various court documents
- Attend meetings and assist attorney with preparation of clients for meetings with the government and law enforcement

Goldberg Weprin Finkel Goldstein LLP

New York, NY

06/16- 09/18

Legal Assistant to Partner

- Prepared and reviewed documents for pending legal matters
- Assisted lead attorney in ascertaining and organizing requested documents
- Translated and prepared documents for Spanish speaking clients
- Conducted research regarding Property data using Property Shark, NYC department of Finance, ACRIS

Kinsey Equities LLC

New York, NY

07/15-04/16

Administrative Legal Assistant

- Liaison to inhouse counsel regarding landlord/tenant issues
- Organized and prepared payments for property fees and taxes.
- Located and notified delinquent accounts and arranged debt repayment schedules

K. Huang Realty Corp

New York, NY

09/13- 07/15

Paralegal/Assistant Property Manager

- Organized and prepared documents to assist attorney during Housing Court matters.
- Appeared and represented corporation in Administrative Court to dispute violations against the Environmental control board, Department of buildings, Division of Housing and Community renewal, and Housing court.
- Created invoices, reports, memos, letters, finance statements and all other documents.
- Calculated and prepared payments property taxes, fees and expenses.

Arbor Education and Training

New York, NY

10/11- 05/12

Business Relations Specialist

- Created and executed marketing plans to prospective employers.
- Sourced and canvased local neighborhoods for employment opportunities for agency's client base.
- Carefully pre-screened clients and conduct interviews training to better prepare them for employment.
- Coordinated job fairs on-site which include workshops, introductions, interviews, and networking.
- Created and managed all reporting for our recruiters, which included detailed descriptions of each of the agency's clients and transactions.

EDUCATION:

The City College of New York Paralegal Certificate	New York, NY	Est. 06/2021
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Licensed NY Real Estate agent/	New York, NY	12/2021
Notary Public	New York, NY	06/2022
Property Manager Certificate	NYC/HPD	06/2015

SKILLS: Bi-lingual (English/ Spanish) Proficient in MS Office, Adobe Acrobat and legal research